

ID. Date of interview  
date 12/02/20

ID. Time interview started  
start 08:48:38

ID.end Completion date of interview  
Date 12/02/20

ID.end Time interview ended  
08:55:33

ID. Duration of interview  
time 6.92

new case

ICO consultation on the draft right of access  
guidance

Q1 Does the draft guidance cover the relevant issues about the right of access?

Yes

No

Unsure / don't know

If no or unsure/don't know, what other issues would you like to be covered in it?

Q2 Does the draft guidance contain the right level of detail?

- Yes
- No
- Unsure / don't know

If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

Need more information re stopping the clock as not having the ability to do this greatly impacts on the organisations compliance figures. As handling 100+ requests a month, which often need consultation with the applicant.

Q3 Does the draft guidance contain enough examples?

Yes

No

Unsure / don't know

If no or unsure/don't know, please provide any examples that think should be included in the draft guidance.

Q4 We have found that data protection professionals often struggle with applying and defining 'manifestly unfounded or excessive' subject access requests. We would like to include a wide range of examples from a variety of sectors to help you. Please provide some examples of manifestly unfounded and excessive requests below (if applicable).

Q5 On a scale of 1-5 how useful is the draft guidance?

|                       |                       |                          |                                     |                       |
|-----------------------|-----------------------|--------------------------|-------------------------------------|-----------------------|
| 1 - Not at all useful | 2 – Slightly useful   | 3 –<br>Moderately useful | 4 – Very useful                     | 5 – Extremely useful  |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/>    | <input checked="" type="checkbox"/> | <input type="radio"/> |

Q6 Why have you given this score?

some areas need further examples

Q7 To what extent do you agree that the draft guidance is clear and easy to understand?

|                       |                       |                               |                                     |                       |
|-----------------------|-----------------------|-------------------------------|-------------------------------------|-----------------------|
| Strongly<br>disagree  | Disagree              | Neither agree<br>nor disagree | Agree                               | Strongly<br>agree     |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/>         | <input checked="" type="checkbox"/> | <input type="radio"/> |

Q8 Please provide any further comments or suggestions you may have about the draft guidance.

Following the GDPR legislation change in 2017 the Trust has seen a significant increase in SAR along with telephone queries. Whilst we have managed this change without any further investment in staffing/resources the further proposed change to timescales will hinder the efficiency in which the requests are currently dealt with. Systems will need to be reset along with reorganisation of staffing etc – all of which is now impossible with the current constraints on funding within the acute Trust setting. This Trust currently manages to comply with the 30 day timescales most of the time but the impact of not being able to apply stopcock or have additional guidance around this will most certainly see breaches to timescales and complaints increase. This in itself will expose NHS organisations to the risk of fines which of course, will hinder the reputation/performance of a cash strapped organisation.

Q9 Are you answering as:

- An individual acting in a private capacity (eg someone providing their views as a member of the public)
- An individual acting in a professional capacity
- On behalf of an organisation
- Other

Please specify the name of your organisation:

NHS Trust

What sector are you from:

NHS

Q10 How did you find out about this survey?

- ICO Twitter account
- ICO Facebook account
- ICO LinkedIn account
- ICO website
- ICO newsletter
- ICO staff member
- Colleague
- Personal/work Twitter account
- Personal/work Facebook account
- Personal/work LinkedIn account
- Other

If other please specify: